

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

WILLIAM H. FITZGERALD

Debtor

FIRST NATIONAL COMMUNITY BANK

Movant

v.

WILLIAM H. FITZGERALD and
CHARLES J. DEHART, III,
ESQUIRE, CHAPTER 13 TRUSTEE

Respondent

Case No. 5-17-04313

Chapter 13

John J. Thomas, B.J.

**DEBTOR'S REPLY TO MOTION FOR RELIEF OF FIRST NATIONAL
COMMUNITY BANK**

AND NOW, comes the Debtor herein by and through his attorney, Brian E. Manning Esquire, and files the following Answer to the Motion for Relief and in support thereof alleges :

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted. By way of further answer Debtor's motive in filing is to save his residence.
6. Debtor responds as follows:

a. After reasonable investigation, the answering party is without sufficient knowledge or information to form a belief as to the truth of the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial.

b. After reasonable investigation, the answering party is without sufficient knowledge or information to form a belief as to the truth of the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial.

7. Admitted.

8. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.

9. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.

10. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.

WHEREFORE, the Debtor respectfully requests that this Court enter an order denying the Motion for Relief without prejudice and granting the Debtor such other and further relief as the Court deems just and appropriate under the circumstances.

Respectfully Submitted
Law Offices of Brian E. Manning
/s/ Brian E. Manning
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